

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Mar 11, 2024**

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND MUSGROVE,

Defendant.

No. 2:24-CR-00016-SAB-1

**ORDER GRANTING MOTION  
FOR PROTECTIVE ORDER**

Before the Court is the Government's Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information, ECF No. 20. Defendant is represented by Molly Winston. The Government is represented by Frieda Zimmerman. The motion was considered without oral argument.

The Government moves the Court to enter a protective order regarding the dissemination of discovery materials and the sensitive information contained therein. The Government's motion indicates that Defendant does not oppose entering this protective order. Being fully informed, the Court finds good cause to grant the motion.

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**ORDER GRANTING MOTION FOR PROTECTIVE ORDER # 1**

1 Accordingly, **IT IS HEREBY ORDERED:**

2 1. The Government's Motion for Protective Order Regulating Disclosure  
3 of Discovery and Sensitive Information, ECF No. 20, is **GRANTED**.

4 2. The Government is authorized to disclose the discovery including  
5 sensitive information and materials (hereinafter "Discovery") in its possession  
6 pursuant to the discovery obligations imposed by this Court.

7 3. Government personnel and counsel for Raymond Kenneth Musgrove  
8 shall not provide, or make available, the sensitive information in the Discovery to  
9 any person except as specified in the Order or by approval from this Court.

10 Counsel for Defendant and the Government shall restrict access to the Discovery,  
11 and shall only disclose the sensitive information in the Discovery to their client,  
12 office staff, investigators, independent paralegals, necessary third-party vendors,  
13 consultants, and/or anticipated fact or expert witnesses to the extent that defense  
14 counsel believes is necessary to assist in the defense of their client in this matter or  
15 that the Government believes is necessary in the investigation and prosecution of  
16 this matter. No copies of Discovery shall be left with their client.

17 4. Third parties contracted by the United States or counsel for Defendant  
18 to provide expert analysis or testimony may possess and inspect the sensitive  
19 information in the Discovery, but only as necessary to perform their case-related  
20 duties or responsibilities in this matter. At all times, third parties shall be subject to  
21 the terms of the Order.

22 5. Discovery in this matter will be available to defense counsel via  
23 access to a case file on USA File Exchange. If necessary, to review discovery with  
24 their respective clients, defense counsel may download the discovery and duplicate  
25 only once. Discovery materials may not be left in the possession of Defendant. In  
26 order to provide discovery to a necessary third-party vendor, consultant, and/or  
27 anticipated fact or expert witness, counsel for Defendant may duplicate the  
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1 discovery only once. No other copies may be made, by defense counsel or the  
2 defendant, without prior approval from this Court.

3         6. All counsel of record in this matter, including counsel for the United  
4 States, shall ensure that any party, including the Defendant, that obtains access to  
5 the Discovery, is provided a copy of this Order. No other party that obtains access  
6 to or possession of the Discovery containing sensitive information shall retain such  
7 access to or possession of the Discovery containing sensitive information shall  
8 retain such access to or possession unless authorized by this Order, nor further  
9 disseminate such Discovery except as authorized by this Order or the further Order  
10 of this court. Any other party that obtains access to, or possession of, the Discovery  
11 containing discovery information once the other party no longer requires access to  
12 or possession of such Discovery shall promptly destroy or return the Discovery  
13 once access to Discovery is no longer necessary. For purposes of this Order, “other  
14 party” is any person other than appointed counsel for the United States or counsel  
15 for Defendant.

16         7. All counsel of record, including counsel for the United States, shall  
17 keep a list of the identity of each person to whom the Discovery containing  
18 sensitive information is disclosed. Neither counsel for Defendant nor counsel for  
19 the United States shall be required to disclose the list of persons unless ordered to  
20 do so by the Court.

21         8. Upon entry of a final order of the Court in this matter and conclusion  
22 of any direct appeals, government personnel and counsel for Defendant shall  
23 retrieve and destroy all copies of the Discovery containing sensitive information,  
24 except that counsel and government personnel may maintain copies in their closed  
25 files following their customary procedures.

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1           9. Government personnel and counsel for Defendant shall promptly  
2 report to the Court any known violations of this Order.

3           **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter  
4 this Order and provide copies to counsel.

5           **DATED** this 11th day of March 2024.



10           *Stanley A. Bastian*

11           Stanley A. Bastian  
12 Chief United States District Judge  
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